ORIGINAL

MC CABE & ALLEN

THE CONNER CENTER 9105 OWENS DRIVE POST OFFICE BOX 2126 MANASSAS PARK, VIRGINIA 22111 (703) 361-2278 FACS (703) 361-0594

> Thomas J. Mc Cabe Robert G. Allen Denise B. Moline

Douglas W. Harold, Jr. Lloyd D. Young Of Counsel production of the second of th

2000 L STREET, N.W. SUITE 200 WASHINGTON, D.C. 20036 (202) 452-7872 Telex 373-0708 FACS (202) 833-3843

Direct Correspondence to office.

Virginia

June 17, 1991

RECEIVED

Ms. Donna R. Searcy, Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

Re: MM Docket 91-10

Baldwin, Florida M&A #15111 JUN 17 1991

FEDERAL COMMUNICATIONS COMVESION OFFICE OF THE SECRETARY

Dear Ms. Searcy:

On behalf of Charley Cecil and Dianna Mae White, d/b/a White Broadcasting Partnership, there is transmitted herewith an original plus six (6) copies of a Consent Motion for Extension of Time in the above-referenced Docket proceeding for a new FM Station at Baldwin, Florida.

Should there be any question regarding the attached Consent Motion, please contact the undersigned.

Very truly yours

Denise B. Moline

DBM:wp
Attachment

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

In re Applications of

Charley Cecil & Dianna
Mae White, d/b/a
WHITE BROADCASTING PARTNERSHIP

et al.

For Construction Permit
for a new FM Station, Channel 289A
Baldwin, Florida

MM DOCKET NO. 91-10

FILE NO. BPH-891214MM

RECEIVED

AUN 17 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Honorable Edward Luton
Administrative Law Judge

CONSENT MOTION FOR EXTENSION OF TIME

Charley Cecil & Dianna Mae White, d/b/a WHITE BROADCASTING PARTNERSHIP ("White") by Counsel, respectfully submits the instant Consent Motion for Extension of Time in which to reply to the Opposition to Motion to Enlarge Issues filed by Peaches Broadcasting, Ltd ("Peaches") on June 5, 1991, and requests that the Presiding Judge grant this Motion and allow White an additional two (2) days, or until June 19, 1991, in which to file its Reply.

- 1. White's Reply to the Opposition filed by Peaches would ordinarily have been due on or before June 17, 1991. However, on June 11, 1991, Peaches filed a Supplement to its Opposition, which provided additional substantive material to which White is entitled to Reply. White received a copy of the Supplement only on Friday, June 14, 1991.
 - 2. Counsel for White contacted Counsel for Peaches on

June 14, 1991, and requested an additional two days in which to submit its Reply. Counsel for Peaches indicated it would have no objection to this request.

3. Grant of the request will not significantly delay action on the pending Motion to Enlarge, and will allow White to submit a complete Reply. No party will be prejudiced by this slight delay in submission of White's Reply.

WHEREFORE, the foregoing considered, White respectfully requests that the Presiding Judge GRANT the instant Consent Motion, and allow White an additional two (2) days, or until June 19, 1991, in which to file its Reply to Peaches' Opposition to Motion to Enlarge Issues.

Respectfully submitted,
Charley Cecil & Dianna Mae White
d/b/a
WHITE BROADCASTING PARTNERSHIP

Denise B. Moline

Its Attorney

McCabe & Allen 9105B Owens Drive P.O. Box 2126 Manassas Park, VA 22111

(703) 361-2278

June 17, 1991

CERTIFICATE OF SERVICE

I, Kelly A. O'Donnell of the Law Firm of McCabe & Allen, do hereby certify that I have caused to be served, this 17th day of June, 1991, by First-class mail, postage prepaid, a copy of the foregoing "Consent Motion for Extension of Time" on the following:

- * Honorable Edward Luton
 Administrative Law Judge
 Federal Communications Commission
 2000 L Street, N.W., Room 225
 Washington, D.C. 20554
- * Paulette Laden, Esq.
 Hearing Branch
 Federal Communications Commission
 2025 M Street, N.W., Room 7212
 Washington, D.C. 20554
 Counsel for the Mass Media Bureau

David Honig, Esq. 1800 N.W. 187th Street Miami, FL 33056 Counsel for Peaches Broadcasting, Ltd.

Arthur Belendiuk, Esq.
Smithwick & Belendiuk, P.C.
2033 M Street, N.W., Suite 207
Washington, D.C. 20036
Counsel for Douglas Johnson

James L. Winston, Esq.
Rubin, Winston & Diercks
1730 M Street, N.W., Suite 412
Washington, D.C. 20036
Counsel for Northeast Florida Broadcasting Corp.

Avelino G. Halagao, Esq 7799 Leesburg Pike, Suite 900 Falls Church, VA 22043 Counsel for Jem Productions, Ltd. Partnership

Federal Aviation Administration Office of Chief Counsel, AGC-230 800 Independence Avenue, S.W. Washington, D.C. 20591

Kelly A. O'Donnell

*Courtesy Copy, Hand-delivered